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12      Attorneys for Defendants Las Vegas Metropolitan Police Department,  
13      Lieutenant Kurt McKenzie, Officer Tabatha Dickson, Captain Patricia  
14      Spencer, Captain Dori Koren, Officer Evan Spoon and Officer Jordan Turner

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 LANCE DOWNES-COVINGTON, an  
11 individual, SOLDADERA SANCHEZ, an  
12 individual, ROBERT O'BRIEN, an  
13 individual, EMILY DRISCOLL, an  
individual, ALISON KENADY, an  
individual, TENISHA MARTIN, an  
individual, GABRIELA MOLINA, an  
individual.

Case Number:  
2:20-cv-01790-CDS-DJA

**Plaintiffs,**

VS.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, in its official capacity;  
LIEUTENANT KURT MCKENZIE, as an  
individual and in his capacity as a Las Vegas  
Metropolitan Police Department Officer;  
OFFICER TABATHA DICKSON, as an  
individual and in her capacity as a Las Vegas  
Metropolitan Police Department Officer;  
CAPTAIN PATRICIA SPENCER, as an  
individual and in her capacity as a Las Vegas  
Metropolitan Police Department Officer;  
CAPTAIN DORI KOREN, as an individual  
and in his capacity as a Las Vegas  
Metropolitan Police Department Officer;  
EVAN SPOON, as an individual and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; JORDAN TURNER, as  
an individual and in his capacity as a Las  
Vegas Metropolitan Police Department  
Officer; UNKNOWN OFFICERS 1-14, as  
individuals and in their capacity as Las Vegas  
Metropolitan Police Department Officers,

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINE**

**(FIRST REQUEST)**

MARQUIS AURBACH

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**

**(FIRST REQUEST)**

3 Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily  
4 Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through  
5 their attorneys of record, Margaret A. McLetchie, Esq., Leo S. Wolpert, Esq. and Lisa A.  
6 Rasmussen, Esq., with the law firm of McLetchie Law and Defendants, the Las Vegas  
7 Metropolitan Police Department (the "Department" or "LVMPD"), Lieutenant Kurt  
8 McKenzie ("McKenzie"), Officer Tabatha Dickson ("Dickson"), Captain Patricia Spencer  
9 ("Spencer"), Captain Dori Koren ("Koren"), Officer Evan Spoon ("Spoon"), and Officer  
10 Jordan Turner ("Turner"), collectively ("LVMPD Defendants"), by and through their  
11 attorneys of record, Craig R. Anderson, Esq. and Andrew Yates, Esq., with the law firm of  
12 Marquis Aurbach, hereby agree and jointly stipulate the following.

13       1. This request for an extension of time is not sought for an improper purpose or  
14 other purpose of delay. The parties are requesting a 80-day extension at this time.

15       2. The dispositive motion deadline in this case is currently August 4, 2025. ECF  
16 No. 202 at 26.

17       3.     For cost-saving and efficiency purposes, the parties agree that the dispositive  
18 motion deadline in this case should be extended to be close in time to, or clustered with, the  
19 dispositive motion deadlines in two cases involving distinct facts and circumstances but  
20 similar policy issues. These two cases are *Wright-Rogers v. LVMPD, et al.*, Case No. 2:22-  
21 cv-00867-CDS-BNW and *Solomon v. LVMPD, et al.*, Case No. 2:22-cv-00847-JCM-DJA.

22       4.     While *Wright-Rogers*, *Solomon*, and this case differ factually in some respects  
23 relevant to each plaintiff, the cases each stem from the widespread protests following George  
24 Floyd's death in 2020 and the police response to those protests.

25        5. Many of the overarching policy, practice, and custom issues related to these  
26 three cases are similar, and as such the *Monell* arguments in each case will likely substantially  
27 overlap.

1       6.     Clustering the dispositive motion deadline here with those in *Wright-Rogers*  
2 and *Solomon* will simplify the issues and streamline the judicial process for the Parties by  
3 permitting the Parties to draft dispositive motions in each case simultaneously.

4       7.     Clustering the dispositive motion deadline here with those in *Wright-Rogers*  
5 and *Solomon* will reduce the burden on and promote judicial efficiency in the courts, and this  
6 Court in particular, through allowing the Parties to present similar issues to the Court around  
7 the same time.

8       8.     The current dispositive motion deadline in *Wright-Rogers v. LVMPD, et al.* is  
9 October 20, 2025.

10      9.     The current dispositive motion deadline in *Solomon v. LVMPD, et al.* is also  
11 October 20, 2025.

12      10.    The Parties understand that there are outstanding discovery issues in these  
13 related matters and that these dates are subject to change. The Parties will promptly update  
14 the Court and, if necessary, provide an updated stipulation for the Court's consideration if  
15 there are any changes to the above dates.

16      11.    This is the first request for extension of time to file dispositive motions in this  
17 matter. The Parties respectfully submit that the reasons set forth above constitute compelling  
18 reasons for the modest extension.

19      12.    The Parties further agree, the dispositive motion deadline currently set for  
20 August 4, 2025, shall be extended to Friday, October 17, 2025.

21      13.    WHEREFORE, the parties respectfully request that the Dispositive Motion be  
22 extended to and including Friday, October 17, 2025.

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24      ...

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1       14. The instant stipulation is being made in good faith and not for purposes of  
2 delay and that no party waives any arguments by entering into this stipulation.

3       IT IS SO STIPULATED.

4       Dated this 29th day of July, 2025.

5       MCLEITCHIE LAW

6       By: /s/ Margaret A. McLetchie  
7           Margaret A. McLetchie, Esq.  
8           Nevada Bar No. 10931  
9           Leo S. Wolpert, Esq.  
10          Nevada Bar No. 12658  
11          Lisa A. Rasmussen, Esq.  
12          Nevada Bar No. 7491  
13          602 South 10th Street  
14          Las Vegas, Nevada 89101  
15          Attorneys for Plaintiffs

Dated this 29th day of July, 2025.

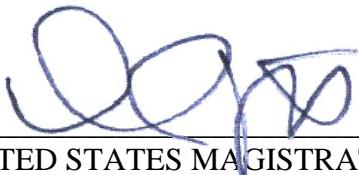
MARQUIS AURBACH

6       By: /s/ Andrew D. Yates  
7           Craig R. Anderson, Esq.  
8           Nevada Bar No. 6882  
9           Andrew D. Yates, Esq.  
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13          Attorneys for Defendants Las Vegas  
14          Metropolitan Police Department,  
15          Lieutenant Kurt McKenzie, Officer  
16          Tabatha Dickson, Captain Patricia  
17          Spencer, Captain Dori Koren, Officer  
18          Evan Spoon and Officer Jordan Turner

15       **ORDER**

16       The above Stipulation is hereby GRANTED.

17       IT IS SO ORDERED.

18  
19            
20          

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UNITED STATES MAGISTRATE JUDGE

21       DATED: 7/31/2025

MARQUIS AURBACH  
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Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that I electronically filed the foregoing **STIPULATION AND**  
3 **ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)** with  
4 the Clerk of the Court for the United States District Court by using the court's CM/ECF system  
5 on the 29th day of July, 2025.

6                    I further certify that all participants in the case are registered CM/ECF users  
7 and that service will be accomplished by the CM/ECF system.

8                    I further certify that some of the participants in the case are not registered  
9 CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid,  
10 or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to  
11 the following non-CM/ECF participants:

12                   N/A

13  
14                   /s/ Krista Busch  
15                   An employee of Marquis Aurbach

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